

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR/SYNTHETIC MINOR DRAFT PERMIT NO. F-04-028

The C. W. Zumbiel Company
2339 Harris Av. Norwood, OH 45212

OCTOBER 20, 2004

FROUGH SHERWANI, REVIEWER

PLANT I.D. # 021-015-00146

SOURCE PROCESS DESCRIPTION:

The C. W. Zumbiel Company has applied for a permit to construct and operate a commercial printing press. Once constructed, the facility will have:

- (a) 8-color in-line flexographic printing press with 7 ink applicators and one coating applicator;
- (b) 8 natural gas-fired drying ovens at 0.618 MMBtu/hr each and;
- (c) In-line rotary die cutter.

Emission Point: 1 8-Color Flexographic Press

MP1	Seven (7) Ink Application Station
MP2	Extender
MP3	One (1) Overcoat Varnish Application Station
MP4	Topcoat Blend
MP5	Misc. Ink Additives
MP6	Clean-Up
MP7-MP14	Eight (8) Drying Ovens (Natural Gas)

COMMENTS:

Emission factors and their source:

AP – 42 5th edition, and mass balance (MSDS) are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

- 1. 401 KAR 59:210. New fabric, vinyl and paper surface coating operations.
- 2. 401 KAR 59:212. New graphic arts facilities using rotogravure and flexography
- 3. 401 KAR 52:030. Federally-enforceable permits for nonmajor sources.
- 4. 401 KAR 63:021, Existing sources emitting toxic air pollutants

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 45 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 10.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
4. The affected facility shall be exempt from Section 3 of 401 KAR 59:210 regulation if the VOC content of the coating is less than 0.35 kg/l of coating (two and nine-tenths (2.9) lb/gal), excluding water or exempt solvent or both, delivered to the applicators associated with the coating line.
5. The affected facility shall be exempt from Section 3 of 401 KAR 59:212 regulation if the printing systems utilize a waterborne ink whose volatile portion consists of seventy-five (75) volume percent water and twenty-five (25) volume percent organic solvent (or a lower VOC content) in all printing units.

PERIODIC MONITORING:

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 months emission limitations.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.